

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America,

v.

Eric James Langlois

Case: 2:23-mj-30204

Assigned To : Unassigned

Assign. Date : 5/19/2023

CMP: USA v LANGLOIS (MAW)

CRIMINAL COMPLAINT

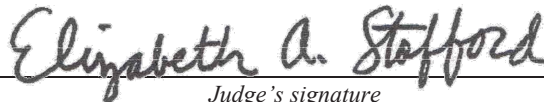
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 17, 2023 in the county of Wayne in theEastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a firearm
18 U.S.C. § 922(o)	Possession of a machine gun
26 U.S.C. §§ 5861(c), (d), and (f)	Receipt or possession of a firearm made in violation of the National Firearms Act (NFA), receipt or possession of an unregistered firearm, and making of a firearm in violation of the NFA

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: May 19, 2023City and state: Detroit, Michigan*Complainant's signature*Kenton M. Weston, Special Agent (ATF)*Printed name and title**Judge's signature*Hon. Elizabeth A. Stafford, United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, Kenton M. Weston, being first duly sworn, hereby state:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), assigned to the Detroit Field Division since January 2018. I graduated from the ATF Privately Made Firearm (PMF) and Machine Gun Conversion (MCD) Train the Trainer Course, Criminal Investigator Training Program, and the ATF Special Agent Basic Training Program. During my employment with the ATF, I have conducted and/or participated in numerous criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs.

2. I am currently assigned to the Pontiac Gun Violence Task Force (GVTF), a task force established by the Oakland County Sheriff's Office (OCSO) and the ATF. The GVTF is tasked with investigating the unlawful possession of firearms and violent firearm crimes committed within the city of Pontiac, Oakland County, and or the surrounding area. During my employment with the ATF, I have been involved in over a hundred investigations involving violent crimes, which have resulted in the seizure of illicit controlled substances, hundreds of firearms, and over one hundred arrests.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Eric James LANGLOIS (XX/XX/1992).

4. I have probable cause to believe that LANGLOIS, who knew he was a convicted felon, knowingly possessed a firearm, which traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1). Additionally, LANGLOIS possessed a 3D printed MCD (machine gun) and a suspected illegally manufactured NFA destructive device, all in violation of 18 U.S.C. § 922(o) and 26 U.S.C §§ 5861(c), (d), and (f).

5. I make this affidavit based on my participation in this investigation, interviews conducted by myself and other law enforcement agents, reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

6. The information in this affidavit is for the limited purpose of establishing probable cause and does not contain all details or all facts relating to this investigation.

PROBABLE CAUSE

7. Between May 4, and May 14, 2023, Michigan Department of Corrections (MDOC) identified that multi-convicted felon LANGLOIS, who is currently on MDOC felony probation, stated in MDOC monitored communications

that he was “making grenades” and assembling suspected firearms that LANGLOIS was intending to sell. MDOC suspected this was occurring at his MDOC registered address located at XXXX Brookline, Canton, MI, which he was the sole owner of and is located in the Eastern District of Michigan.

8. On May 17, 2023, at approximately 11:30 AM, MDOC Agent Theresa Krzyzak with the assistance of the ATF and GVTF conducted a compliance check at LANGLOIS’ residence. Moments after arriving at the residence, Agent Krzyzak made verbal contact with LANGLOIS, identified herself, her intention, and subsequently conducted a compliance check. While conducting the compliance check, convicted felon Joseph CHARBONEAU (DOB XX/XX/1980) was located in the first-floor bedroom.

9. After exiting the bedroom, Agents observed numerous items that indicated a mass PMF manufacturing operation was occurring inside the residence. Shortly after, ATF Task Force Officer (TFO) Kyle Mountz and I conducted a video and audio recorded post-*Miranda* interview with CHARBONEAU. During the interview, CHARBONEAU stated in summary, he is a convicted felon, is prohibited from possessing firearms, directed agents to the only firearm that belonged to him, which was a black PMF located near his wallet and approximately 43 grams of suspected methamphetamine. CHARBONEAU denied ownership of the PMF manufacturing equipment.

10. Agents conducted a search of the first-floor bedroom and recovered items to include but not limited to the following items:

- a. One loaded Sccy CPX2 9mm pistol bearing serial number C326275 with an inserted magazine containing 10 live rounds of ammunition located in the first-floor bedroom attached bathroom and recovered by TFO Mountz. A search of the Law Enforcement Information Network (LEIN) revealed this firearm was reported stolen on February 3, 2023.
- b. One white 3D printed MCD “Invisible Switch” located on the bookshelf in the first-floor bedroom recovered by TFO Mountz. See Image 1 and 2 below of the recovered MCD.

Image 1



Image 2



- c. One loaded black Polymer80 9mm firearm located next to the recliner and recovered by TFO Mountz.
- d. One black Apple iPhone SE located on LANGLOIS and recovered by me. LANGLOIS provided consent to search the device for evidence of his suspected firearm trafficking and possession.

- e. Various 3D printing equipment to include printers, firearm jigs, firearm parts, ammunition, power tools, computer equipment, and over 45 PMF frames and or receivers.

11. Moments later, ATF Special Agent Josh Mclean and I conducted a video and audio recorded post-*Miranda* interview with LANGLOIS. During the interview, LANGLOIS stated in summary, all the firearm manufacturing equipment belonged to him, to date he has not sold any firearms he manufactured inside the residence, obtained all the firearm and equipment through online purchases, he confirmed he created the recovered MCD (Invisible Switch) and noted the item “doesn’t work”, and learned how to manufacture “years ago.” LANGLOIS stated he shot the recovered Polymer80 9mm firearm at a friend’s house and stated, “it wasn’t fair that when I got into trouble, that I couldn’t protect my family the same, I came up with the idea (to sell firearms), but I never did.” Additionally, pertaining to the items recovered, LANGLOIS signed ATF Form 3220.11 Consent to Search and ATF Form Consent to Forfeiture or Destruction of Property and Waiver of Notice ATF Form 3400.1

12. On May 18, 2023, TFO Mountz and I conducted a partial physical review of LANGLOIS’ Apple iPhone. We observed an image, dated April 17, 2023, at approximately 12:31 PM, that displayed numerous suspected firearms and PMFs on top of a bed that matches some of the items that were recovered on May 17, 2023 (see Image 3 below). Also, based on the size shape and customized do-it-yourself

(“DIY”) white coloring of the logo located on the handle of the recovered SCCY CPX2 (see Image 4 below). As such, the gun in Image 3 (circled in red) matches the recovered firearm from Image 4. Based on the image’s metadata, it appears to have been captured with LANGLOIS’ Apple iPhone.

Image 3



Image 4



13. TFO Mountz and I observed a conversation dated March 31, 2023, between LANGLOIS and an individual labelled “Rj”. During the text conversation, LANGLOIS discussed the sale of a suspected Glock model 19 9mm firearm and states “I have been working on a switch or a backplate to drive the price up.”

14. Based on my training on MCDs and experience in previous MCD investigations and seizures, I know that a “Switch” and or “Invisible Switch” is a colloquialism for a MCD aka a “Glock Switch.” A Glock Switch is a small device that replaces the back plate and typically protrudes from the back of the slide on a Glock pistol. When installed, the device applies pressure to the trigger bar and

disables the firearm's ability from limiting one round of ammunition to be fired per one trigger pull, making the firearm a machine gun. Additionally, an uninstalled Glock Switch and or an Invisible Switch, by itself, is a machine gun under Federal law.

15. As Agents were speaking with LANGLOIS, ATF Certified Explosives Specialist and Bomb Tech Special Agent John Franklin, who was assisting with the compliance check, recovered 2 suspected improvised explosive devices from the first floor living room and 3 fragments from of a suspected post blast scene located in the side yard next to the driveway of the residence. Based on the design, lack of a serial number, and materials contained inside the device, ATF Special Agent John Franklin noted the recovered item appears to violate the National Firearm Act (NFA). Additionally, during an unrecorded conversation CHARBONEAU denied knowledge of the suspected improvised explosive devices.

16. A search of LEIN provided the following brief history of LANGLOIS's criminal history:

- a. January 23, 2006, investigated by the Drug Enforcement Administration (I7060024) and convicted in federal court for Conspiracy to Distribute MDA/MDMA/MDE.
- b. March 24, 2017, pled guilty in Michigan's 3rd Circuit Court to Felony Weapons- Firearms- Possession by Felon, Felony Weapons – Ammunition- Possession by Felon.

- c. September 1, 2017, pled guilty in Michigan's 3rd Circuit Court to Felony Weapons- Firearms- Possession by Felon, Felony Weapons Felony Firearm.
- d. September 1, 2017, pled guilty in Michigan's 3rd Circuit Court to Felony Controlled Substance- Possession of Methamphetamine, Felony Weapons Felony Firearm.
- e. November 10, 2022, pled guilty in Michigan's 3rd Circuit Court to Felony Weapons- Firearms- Possession by Felon.

17. ATF Industry Operations Investigator (IOI) Misty Morin queried LANGLOIS in the National Firearms Act Registration and Transfer Record (NFRTR) and observed that LANGLOIS does not have any NFA items registered to him. Additionally, based on IOI Morin's results, LANGLOIS is prohibited from possessing and manufacturing NFA regulated weapons.

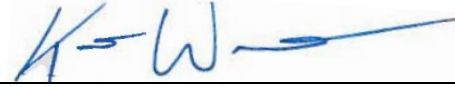
18. ATF Special Agent Jimmie Pharr, an Interstate Nexus expert, was on scene during the search who indicated the firearm noted above were not manufactured in the State of Michigan and therefore had traveled in or affected interstate or foreign commerce.

CONCLUSION

19. Probable cause exists that Eric James LANGLOIS, a prior convicted felon, was in possession of the above-described firearm, MCD, and suspected improvised explosive devices. The recovered firearm has previously travelled in foreign or interstate commerce. Therefore, probable cause exists that Eric James

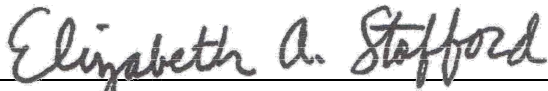
LANGLOIS committed violations of 18 U.S.C. § 922(g)(1), 18 U.S.C. § 922(o), and 26 U.S.C §§ 5861(c), (d), and (f) within the Eastern District of Michigan.

Respectfully submitted,



Kenton M. Weston, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: May 19, 2023